

BARON SAMSON LLP
27 Horseneck Road, Suite 210
Fairfield, New Jersey 07004
(973) 244-0030
Attorneys for Defendant
Toms River Kia

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

JOSEPH P. GREENLEY, JR.,

Plaintiff,

v.

TOMS RIVER KIA,

Defendant.

Civil Action No. 3:16-cv-04454-AET-DEA

**NOTICE OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P.
12(b)(1)**

TO: Mathew B. Weisberg, Esq.
Weisberg Law
7 S. Morton Ave.
Morton, PA 19070

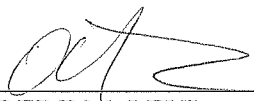
PLEASE TAKE NOTICE that on January 17, 2017, at 9:00 a.m., or as soon thereafter as counsel may be heard, defendant Toms River Kia ("TRK"), through its attorneys Baron Samson LLP, shall move before the Honorable Anne E. Thompson, U.S.D.J., at the Mitchell H. Cohen Building and U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey, for an order dismissing plaintiff Joseph P. Greenley's Complaint, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that TRK will rely on the Declaration of Albert M. Levi, Esq. and the brief submitted herewith in support of its motion.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

BARON SAMSON LLP

By: 
ALBERT M. LEVI
Attorneys for Defendant
27 Horseneck Road
Suite 210
Fairfield, New Jersey 07004
(973) 244-0030
alevi@baronsamson.com

Dated: December 19, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused the within notice of motion, brief, and proposed Order to be served via the Court's CM-ECF system upon all counsel of record.

BARON SAMSON LLP

Attorneys for Defendant

By 
ALBERT M. LEVI

Dated: December 19, 2016